

**UNITED STATES DISTRICT COURT  
IN THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**MARGUERITE CARRUBBA**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. 1:07CV1238-LG-RHW**

**HARRISON COUNTY, MISSISSIPPI BY AND  
THROUGH ITS BOARD OF SUPERVISORS;  
HARRISON COUNTY SHERIFF GEORGE PAYNE;  
WAYNE PAYNE; DIANE GATSON RILEY;  
STEVE CAMPBELL; RICK GATSON; RYAN TEEL;  
KARLE STOLZE, WILLIAMS PRIEST, JAMES A.  
GONDLES, JR. AMERICAN CORRECTIONAL  
ASSOCIATION; JOHN AND JANE DOES 1-3;  
HEALTH ASSURANCE LLC AND J. L. WHITE**

**DEFENDANTS**

**DEFENDANTS EXHIBIT LIST**

<b>NO.</b>	<b>DESCRIPTION</b>	<b>SPONSOR</b>	<b>ID</b>	<b>EVID</b>
D-1	Gulfport Police Dept. Narrative report completed by Officer Roe 06/17/06.(Pg.1 of 2 & 2 of 2)			8/25/10
D-2	Uniform Arrest/Booking Form 06/17/06			8/25/10
D-3	Traffic Accident Report 06/17/06 (Pg. 1- 6)			8/25/10
D-4	Black and White Booking Photo			8/23/10
D-6	Health Assurance, LLC - Nurse's Notes 06/17/06			
D-7	Post Assignment - 06/17/06 (0700 -1900)			
D-8	Narrative - Sgt. Leonard - 06/17/06			
D-9	Narrative - Sgt. Leonard - 06/18/06			

D-10	Use of Force Report - 06/17/06 (Pg. 1-2)			8/23/10
D-11	Narrative Form, completed by Priest - 06/17/06			8/23/10
D-12	Omitted			
D-13	Google Map of location of Lookout 49, Boone's Tavern, Cabana Lounge, and location of Accident			
D-14	Photograph of Lookout 49			
D-15	Photograph of Restaurant Flare (formerly Lookout 49)(Pg. 1) Photograph of Restaurant Flare(formerly Lookout 49)(Pg. 2)			
D-16	Photograph of Boone's Tavern			
D-17	Photograph of Boone's Tavern			
D-18	Photograph of Cabana Lounge			
D-19	Gulfport Municipal Court Record Case #200613946			8/25/10
D-20	Memorial Hospital at Gulfport Medical Records (Bates Lables - MHG 001, 39, 40, 49, 50, 74, 75, 88, 93, 103, 118, 123, 137, 141-163, 258, 259, 261, 264-316, 334-350, 353, 354, 359, 360, 367-378, 487-500, 502, 550, 551, 703, 720, 735, 768, 771, 772).			8/23/10
D-21	Omitted			
D-22	Advanced Orthopedics Medical Records			8/23/10
D-23	Omitted			
D-24	Beatline Internal Medicine Medical Records (Bates Labels- Carrubba MHG/Beatline Int. Med (Farrar) 001 - 038			8/23/10

D-25	Gulf Coast Mental Health Records (produced per Court Order) (Bates Labels - Carr. GCMHC 001, Carrubba Gulf Coast Mental Health 0017, Carr. GCMHC 017, 019-023, 058-071, 099, 101, 149, 155-166, 191, 193-197, 207, 208). (Redacted Records; Bates Labels - Carr. GCMHC 070, 193, 194, 195-197, 202)		
D-26	Compass Imaging LLC Medical Records (Bates Labels - Carrubba Compass 001-011)		8/23/10
D-27	HCADC Policies and Procedures Directive Use of Force		
D-28	HCADC Policies and Procedures Directive Use of Restraints		
D-29	HCADC Policies and Procedures Directive Health Care Services		
D-30	HCADC Policies and Procedures Directive Inmate Grievance		
D-31	HCADC Policies and Procedures Directive Chain of Command		
D-32	HCADC Policies and Procedures Directive Monthly Statistical Reporting		
D-33	HCADC Policies and Procedures Directive Booking and Receiving		
D-34	HCADC Policies and Procedures Directive Training for Correctional Officers		
D-35	HCADC Policies and Procedures Directive Training Plans		
D-36	HCADC Policies and Procedures Directive Facility Goals		
D-37	HCADC Policies and Procedures Directive		

Supervision of Holding Cells

**D-38** Harrison County Sheriff's Dept. General Order #1, Code of Ethics

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**D-39** Harrison County Sheriff's Dept. General Order #2, Incident Data Collection - Basic Report Writing Rules

**D-40** Harrison County Sheriff's Dept. General Order #10, Weapons and Use of Force

**D-41** Omitted

**D-42** Harrison County Sheriff's Dept. General Order #62, Employee Discipline

**D-43** Harrison County Sheriff's Dept. General Order #65, Professional Standards Unit

**D-44** Diagram of Jail

**D-45** Diagram of Booking Department

**D-46** ACA Accreditation Contracts  
 (ACA Contract dated 01/13/01, Pg. 1-4)  
 (ACA Contract dated 03/18/02, Pg. 5-8)  
 (ACA Contract dated 11/05/02, Pg. 9-12)  
 (ACA Contract dated 5/03/05, Pg. 13-15)

**D-47** Steve Martin's Reports  
 (July 25, 2000, Pg.1-9)  
 (April 20, 2001, Pg. 10-17)  
 (February 20, 2005, Pg. 18-27)

**D-48** Letter to Steve Martin from Capt. Phil Taylor  
 05/24/06(Pg. 1-2)

**D-49** IA Report; IA2002-81  
 (Pg. 1-2)

**D-50** IA Report; IA2003-05  
 (Pg. 1-2)

D-51 IA Report; IA2003-06  
(Pg. 1-6)

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D-52 IA Report; IA2003-08

D-53 IA Report; IA2003-09

D-54 IA Report; IA2003-11  
(Pg. 1-2)

D-55 IA Report; IA2003-14  
(Pg. 1-3)

D-56 IA Report; IA2003-15  
(Pg. 1-2)

D-57 IA Report; IA2003-19  
(Pg. 1-2)

D-58 IA Report; IA2003-21  
(Pg. 1-4)

D-59 IA Report; IA2003-22  
(Pg. 1-4)  
-Termination Letter of Scott Thompson  
(Pg.5)

D-60 IA Report; IA2003-23

D-61 IA Report; IA2003-23  
(Pg. 1-3)

D-62 IA Report; IA2003-24  
(Pg. 1-4)

D-63 IA Report; IA2003-29  
(Pg. 1-7)

D-64 IA Report; IA October 23, 2003

D-65 IA Report; IA2003-34  
(Pg. 1-4)

D-66 IA Report; IA2003-37  
(Pg. 1-2)

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D-67 IA Report; IA2003-44  
(Pg. 1-2)

D-68 IA Report; IA2004-001  
(Pg. 1-9)

D-69 IA Report; IA2004-02  
(Pg. 1-9)

D-70 IA Report; IA2004-03  
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D-71 IA Report; IA2004-04  
(Pg. 1-5)

D-72 IA Report; IA2004-08  
(Pg. 1-2)

D-73 IA Report; IA2004-09  
(Pg. 1-4)

D-74 IA Report; IA2004-13  
(Pg. 1-3)

D-75 IA Report; IA2004-18  
(Pg. 1-3)

D-76 IA Report; IA 2004-19  
(Pg. 1-4)

D-77 IA Report; IA2004-20  
(Pg. 1-4)

D-78 IA Report; IA2004-22  
(Pg. 1-10)

D-79 IA Report; IA2004-27  
(Pg. 1-6)

**D-80** IA Report; IA2004-30  
 (Pg. 1-4)  
 -Letter of Disciplinary Action of Patricia Farris  
 (Pg. 5)

**D-81** Omitted

**D-82** IA Report; IA2005-05  
 (Pg. 1-4)

**D-83** IA Report; IA2005-06  
 (Pg. 1-5)  
 -Letter of Disciplinary Action of Lee Otis Jackson  
 (Pg. 6)

**D-84** IA Report; IA2005-07  
 (Pg. 1-9)  
 -Letter of Disciplinary Action of Daniel Evans,  
 05/06/05 (Pg. 10)

**D-85** IA Report; IA2005-008  
 (Pg. 1-3)

**D-86** IA Report; IA2005-10  
 (Pg. 1)  
 -Notice of Hearing of Hearing of Deputy Jerred Necaise  
 5/5/05 (Pg. 2)  
 -Letter of Resignation of Deputy Jerred Necaise  
 5/09/05 (Pg.3)

**D-87** IA Report; IA2005-14  
 (Pg. 1-2)

**D-88** IA Report; IA2005-16  
 (Pg. 1-5)

**D-89** IA Report; IA2005-18  
 (Pg. 1-5)

**D-90** IA Report; IA2005-22  
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D-91 IA Report; IA2005-23  
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D-92 IA Report; IA2005-24  
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D-93 IA Report; IA2005-25  
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D-94 IA Report; IA2005-34  
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-Admin. Leave Letter for Dedri Caldwell,  
12/12/05 (Pg. 7)  
-Letter of Disciplinary Action for Dedri Caldwell  
12/21/05 (Pg. 2)  
-Written Reprimand to Justin Richards,  
1/11/06 (Pg. 9)  
-Written Reprimand to Dereck Blankinchip,  
1/11/06 (Pg. 10)  
-Notice of Hearing to Kenneth Roberson,  
1/03/06 (Pg. 11)  
-Written Reprimand to Kenneth Roberson,  
1/11/06 (Pg. 12)  
-Written Reprimand to Morgan Thompson,  
1/11/06 (Pg. 13)  
-Notice of Hearing to James Nicholson,  
1/6/06 (Pg. 14)  
-Termination Notice to James Nicholson,  
1/13/06 (Pg. 15)  
-Written Reprimand to Ben Lamey,  
1/11/06 (Pg. 16)

D-95 IA Report, IA2006-04  
(Pg. 1-6)

-Letter of Disciplinary Action to Dereck Blankinchip  
2/08/06 (Pg. 7)  
- Letter of Disciplinary Action to Eddie Collins  
1/26/06 (Pg. 8)

D-96 IA Report, IA2006-05  
(Pg. 1-8)

- Letter of Disciplinary Action to Daniel Evans

4/4/06 (Pg. 9)  
- Letter of Disciplinary Action to Karl Stolze  
4/4/06 (Pg. 10)

**D-97** IA Report, IA2004-30 (pg. 1)(**Duplicate See Exhibit D-80**)  
- Letter of Disciplinary Action of Patricia Farris (pg. 2)

**D-98** IA Report, IA2006-02A  
(Pg. 1-2)

**D-99** IA Report, IA2006-06  
(Pg. 1-3)

**D-100** IA Report, Investigation of complaint by  
Gretchen Bravo, 3/29/06

**D-101** IA Report, IA2006-0015  
(Pg. 1-2)

**D-102** IA Report, IA2006-17  
(Pg. 1-4)

**D-103** IA Report, IA2006-16, April 27, 2006  
(Pg. 1-2)

**D-104** IA Report, IA2006-21, May 22, 2006  
(Pg. 1-2)

**D-105** Notice of Hearing of Dedri Caldwell,  
8/16/05 (Pg. 1)  
- Letter of Disciplinary Action for Dedri Caldwell  
8/18/05 (Pg. 2)

**D-106** IA Report, IA2004-29  
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- Use of Force Report of Joseph Towner, 11/12/04  
(Pg. 7)  
- Letter of Disciplinary Action of Matin Lipscomb  
1/31/05 (Pg. 8)  
- Letter of Disciplinary Action of Michael Minor  
1/31/05 (Pg. 9)  
- Letter of Disciplinary Action of Jerred Necaise  
1/31/05 (Pg. 10)

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- Letter of Disciplinary Action of Justin Branning  
1/31/05 (Pg. 11)
- Letter of Disciplinary Action of Jeffrey Brawner  
1/31/05 (Pg. 12)
- Letter of Resignation of Jay Cox  
1/4/05 (Pg. 13)

**D-107** Use of Force Report of Uther Street,  
11/16/04 (Pg. 1-2)

- Rule Violation Report of Uther Street,  
11/16/04 (Pg. 3)
- Narrative Form of Nathan Ellsberry,  
11/16/04 (Pg. 4 -5)
- Narrative Form of Joel Phillips,  
11/16/04 (Pg. 6)
- Narrative Form of Jeffrey Brawner,  
11/16/04 (Pg. 7-8)
- Narrative Form of Phillips  
11/16/04 (Pg. 9)
- OC Administration Warning  
11/16/04 (Pg. 10)

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**D-108** Use of Force of Henry Johnson,  
11/28/04 (Pg.1-2)

- Narrative Form of Justin Branning  
11/28/04 (Pg. 3)

**D-109** Use of Force of Alonzo Reeves,  
12/14/04 (Pg. 1-2)

- Narrative Form of Nathan Ellsberry,  
12/15/04 (Pg. 3)
- Narrative Form of Justin Branning,  
12/14/04 (Pg. 4)
- Narrative Form of McBeath,  
12/15/04 (Pg. 5)
- Narrative Form of Thomas Wills,  
12/14/04 (Pg. 6-7)
- Narrative Form of Ryan Teel,  
12/14/04 (Pg. 86)

**D-110** HCADC - Booked In/Released Inmates Chart;  
2000-2006.  
(Pg. 1- 2)

D-111	Inter Office Memo from Capt. Rick Gaston - Handling of Inmates, 4/12/05	8/23/10
D-112	HCADC Booking Area Video - June 11, 2006, 18:20 - June 19, 2006, 07:20	8/23/10
D-113	HCADC Booking Area Video- June 16, 2006, 17:15 - June 17, 2006, 18:21	
D-114	(D-112 & D-113 have been compiled into one DVD <u>Exhibit D-112</u> ) Dr. Jordan Medical Records (Bates Labels, Carrubba Southwest Ctr. for Ortho. 001 -003)	8/23/10